

## REMARKS

Claims 1 and 7 have been amended to more specifically set forth the invention and to include the limitations of claims 6 and 9, respectively. Claims 6 and 9 have been canceled.

### 35 U.S.C. 103§(a) rejections

The rejection of claims 1-11 under 35 U.S.C. §103(a) as being unpatentable over Taylor, U.S. Pat. No. 6,542,583, in view of Watkins, U.S. Pat. No. 5,719,560, is respectfully traversed.

Applicant teaches and claims a password generation and verification system that verifies the selected password element to the sampled password to provide the verification information. As claimed in claims 1 and 7, a plurality of password elements familiar to the user (e.g. mother's name, a relative's name, a singer's name who the user likes, a pet name, etc.) are pre-stored by the user in the element group for each category (See FIGS. 2 and 3). As further claimed in claims 1 and 7, a plurality of scramble elements are pre-stored in the scramble element storage means. A sampled password element is randomly sampled or picked up from the

element group, and a plurality of scramble elements, which not only belong to the same category as the sampled password element but also are different from the sampled password element, are randomly sampled or picked up from the scramble element storage means. The sampled password element and the plurality of scramble elements are mixed and arranged in random order for each category to display the mixed element group (See FIG. 3). The selected password element must be selected from the mixed element group for each category before authentication is provided.

Here it must be specifically noted that each time a category is selected the sampled password element and the scrambled elements can be different. Further, categories are presented, rather than questions, so that a near limitless supply of password elements familiar to the user can be included or stored in the system. Thus, in theory, the display means could display one or more completely different mixed element groups each time the system is accessed. A careful reading of the claims verifies that this concept is specifically claimed.

Further, claim 1 now specifically includes "authentication means for providing authentication when all of said selected password elements match said sampled password elements." Claim 7 also specifically includes a step of "providing authentication when all of said selected password elements match said sampled password elements." Applicant respectfully disagrees with the Examiner as to Taylor's statement in column 7, lines 21-23. Taylor specifically states if "the number of incorrect responses is below the certain limit, then Block 312 provides the user with a desired service." It cannot be disputed that Taylor's system allows some incorrect statements. Thus, in Taylor's system all of the responses do not have to match the correct responses.

Taylor teaches a caller identification verification system that sends a question set to a caller. Taylor does not teach the provision of a plurality of categories and the storing of a plurality of password elements and scramble elements for each category. While Taylor does teach randomly selecting a chosen number of questions from a group of stored questions, he does not teach category sampling means for randomly sampling a predetermined number of specific categories". Applicant does not believe that a specific question with a specific answer is the same as a category with near limitless possible answers. Also, Taylor

very specifically does not teach the random selection of a password element from the stored plurality and a predetermined plurality of sampled scramble elements from the stored plurality and mixing them to provide mixed elements (which may differ in content and arrangement each time they are presented).

As specifically pointed out by Taylor (Taylor specification, col. 6, lines 9-12), "For increased security, it is preferred that the possible answer(s) corresponding to a particular question remains substantially the same each time the question is transmitted to a caller." Thus, Taylor specifically teaches a system that is completely different from applicant's claimed invention.

The Examiner argues that randomly presenting the questions from a set of questions is essentially the same as mixing the password elements so that they are not presented in a fixed way. Applicant respectfully but vehemently disagrees. Taylor's system selects one or more questions with fixed answers from a set of questions. Applicant's system randomly selects one or more categories from a plurality of categories, a password element from a plurality of password elements for each category, and a predetermined plurality of sampled scramble elements, different than said sampled password element, from the plurality of scramble elements. The randomly selected password element and the

plurality of sampled scramble elements are then randomly mixed and displayed. This is not even remotely similar to Taylor's selection of one or more questions with fixed answers from a set of questions.

Also, it must be noted that even though every question presented to the user by Taylor's system can belong to a unique category, the questions with specific answers presented by Taylor's system are not similar to the categories with a plurality of password elements presented by applicant's system.

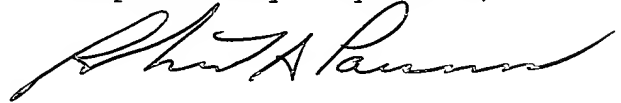
In addition to the above described substantial differences, claims 1 and 7 now specify that "all of said selected password elements match said sampled password elements." As pointed out in detail by Taylor (e.g. see col. 2, lines 8-18), Taylor's system responds to a certain limit of correct responses rather than all responses being correct to receive authentication.

Clearly, the structure claimed in applicant's claim 1 is substantially different than anything described, taught, or suggested by Taylor. Further, the system of Taylor operates entirely differently than applicant's novel method claimed in claim 7. Also, applicant does not believe that the teaching of Watkins, dealing with cue-response pairs, adds anything to the teachings of Taylor that would produce

a combination similar to applicant's claimed structure or method. Therefore, applicant believes that independent claims 1 and 7 are patentable over any proper combination of Taylor and Watkins. Claims 2-5 and 10, and 8 and 11 depend from claims 1 and 7, respectively, and are allowable for the reasons given above.

In view of the foregoing, it is submitted that each of the claims is in condition for allowance. Withdrawal of the rejections and allowance of the claims is respectfully requested. Should there be any questions or remaining issues, Examiner is cordially invited to telephone the undersigned attorney for a speedy resolution.

Respectfully requested,

A handwritten signature in cursive script, appearing to read "Robert A. Parsons".

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